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10	UNITED STATES DISTRICT COURT		
11	DISTRICT OF NEVADA, SOUTHERN DIVISION		
12	***		
13	JACQUELYN NICKLER,	CASE NO. 2:18-cv-01668-JCM-VCF	
14	Plaintiff,		
15	vs.	STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES	
16	CLARK COUNTY, a political subdivision of	ICECOND DEOLIECTI	
	the State of Nevada, including Clark County	[SECOND REQUEST]	
17	District Attorney's Office and Clark County Court Administration Office,		
18	Defendants.		
19			
20			
21	Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of		
22	record, hereby stipulate and request that this Court extend discovery in the above-captioned case		
23	ninety (90) days from the current deadline of January 29, 2021, up to and including Thursday, April		
24	29, 2021. In addition, the parties request that the all other future deadlines contemplated by the		
25	Discovery Plan and Scheduling Order be extended pursuant to Local Rule. In support of this		
26	Stipulation and Request, the parties state as follows:		
27	1. On May 15, 2020 Plaintiff filed her Second Amended Complaint in the United		
28	States District Court.		

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- 2. On May 29, 2020, Defendant filed its Answer to the Second Amended Complaint.
- 3. On July 29, 2020 the parties conducted a 26(f) conference.
- 4. Plaintiff served her Initial and Supplemental Document and Witness Disclosures.
- Defendant served its Initial and Supplemental Document and Witness Disclosures.

## **DISCOVERY REMAINING**

- 1. The parties will continue participating in written discovery.
- 2. Defendant will take the deposition of Plaintiff.
- 4. Plaintiff will take the deposition of Defendant's Person Most Knowledgeable.
- 5. The parties may take the depositions of any and all other witnesses garnered through discovery.

## WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

The parties aver, pursuant to Local Rule 26-4, that good cause exists for the following requested extension. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct discovery.

The parties seek additional time to complete discovery for several reasons, none of which are for an improper purpose or for the purpose of delay. The parties seek additional time due to the logistical and administrative challenges of counsel and Defendant working remotely due to the ongoing national public health crisis. Additionally, Plaintiff's counsel is still catching up from the two month period that he was adversely affected by COVID-19 and a complication that reduced his ability to work full time. Additionally he had a death in the family the second week of November and missed some additional work during that time. Also, family commitments during the holidays this year were particularly demanding. Accordingly, and in short, the parties request an extension of the current discovery deadlines to allow the parties an opportunity to fully understand the nature of Plaintiff's claims and Defendant's defenses thereto.

Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-4 governs

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modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-4.

This is the second request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension.

The following is a list of the current discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	Friday, January 29, 2021	Thursday, April 29, 2021
Deadline to Amend Pleadings or Add Parties	Monday, November 2, 2020	Closed
Expert Disclosure pursuant to FRCP26 (a)(2)	Tuesday, December 1, 2020	Closed
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	Thursday, December 31, 2020	Closed
Dispositive Motions	Monday, March 1, 2021	Monday, May 31, 2021
Joint Pretrial Order	Wednesday, March 31, 2021	Wednesday, June 30, 2021

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

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23 | 24 | ///
25 | 26 | ///
27 | 28 | ///

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WHEREFORE, the parties respectfully request that this Court extend the discovery 1 period by ninety (90) days from the current deadline of January 29, 2021 up to and including April 2 3 29, 2021, and the other dates as outlined in accordance with the table above. 4 DATED this 8<sup>th</sup> day of January, 2021. DATED this 8<sup>th</sup> day of January, 2021. 5 LEWIS BRISBOIS BISGAARD & SMITH LLP KEMP & KEMP, ATTORNEYS AT LAW 6 /s/ Cheryl A. Grames /s/ James P. Kemp 7 Robert W. Freeman, Esq. James P. Kemp, Esq. Nevada Bar No. 6375 Nevada Bar No. 3062 8 Cheryl A. Grames, Esq. 7435 W. Azure Drive, Ste. 110 Nevada Bar No. 12752 Las Vegas, Nevada 89130 9 Tara U. Teegarden Attorneys for Plaintiff Nevada Bar No. 15344 **10** 6385 S. Rainbow Blvd, Suite 600 11 Las Vegas, Nevada 89118 Attorney for Defendant **12** Clark County **13** 14 **ORDER 15** IT IS SO ORDERED: **16 17** Dated this \_\_11th day of \_\_\_ **18** 19 UNITED STATES MAGISTRATE JUDGE **20** 21 22 23 24 25 **26** 27

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